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Attorneys for Defendant
EQUIFAX INFORMATION SERVICES LLC

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

JILL DALE,

Plaintiffs,

v.

WHEELS FINANCIAL GROUP, LLC dba
LOANMART, TARGET
CORPORATION, EQUIFAX
INFORMATION SERVICES LLC and
DOES 1 through 10 inclusive,

Defendants.

Case No. 2:21-cv-00150-KJM-AC

**STIPULATION TO EXTEND TIME
TO RESPOND TO INITIAL
COMPLAINT BY NOT MORE
THAN 28 DAYS (L.R. 144)**

**COMPLAINT SERVED:
DECEMBER 24, 2020
CURRENT RESPONSE DATE:
FEBRUARY 2, 2021
NEW RESPONSE DATE:
MARCH 5, 2021**

Pursuant to Local Rule 144(a), Plaintiff Jill Dale ("Plaintiff") and Defendant Equifax Information Services LLC ("Equifax") (collectively "the Parties"), by and through their respective counsel, hereby stipulate as follows:

1. On December 14, 2020, Plaintiff filed her Complaint against Defendant, Equifax, in the Superior Court of the State of California, County of Sacramento, titled *Jill Dale v. Wheels Financial Group, LLC, et al*; Case No. 34-2020-00290860.

2. Plaintiffs served their Complaint on Equifax on December 24, 2020.

3. Equifax's response to the Complaint was currently due on January 25, 2021.

AMENDED STIPULATION TO EXTEND TIME TO RESPOND TO INITIAL COMPLAINT BY NOT MORE THAN
28 DAYS (L.R. 144)

4. On January 14, 2021, Defendant Equifax submitted its Answer to Plaintiff's Complaint and Affirmative and Other Defenses to the Clerk of the Superior Court.

5. On January 26, 2021, co-defendant Target Corporation timely removed this matter to the United States District Court Eastern District of California. (ECF No. 1).

6. On February 19, 2021, defendant Equifax became aware of the removal when it attempted to file a Notice of Substitution of Counsel with the Superior Court of Sacramento County. Equifax simultaneously became aware that the Answer Plaintiff submitted to the Superior Court was inadvertently not processed due to the timing of the removal.

7. On March 1, 2021, Equifax's counsel conferred with plaintiff's counsel regarding the basis for its need for an extension. Plaintiff's counsel had no objection and provided his assent.

NOW THEREFORE, the Parties hereby stipulate and agree to an extension of time for Defendant to answer or otherwise respond to Plaintiff's Complaint through and including March 5, 2021 and pursuant to Local Rule 144(a).

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

Respectfully submitted on March 4, 2021

By: /s/ Thomas P. Quinn, Jr.
Thomas P. Quinn, Jr.
Attorneys for Defendant
EQUIFAX INFORMATION
SERVICES LLC

By: /s/ Todd M. Friedman
Todd M. Friedman
Attorney for Plaintiff
JILL DALE

IT IS SO ORDERED.

DATED: March 4, 2021 (Nunc pro tunc)



CHIEF UNITED STATES DISTRICT JUDGE